

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**IN RE:
LAWANDA HILL**

Debtor

) **CASE NO: 19-42846-659**
) **Chapter 13**
)
) **Trustee's Objection to Confirmation**
) **Original Confirmation Hearing set for:**
) **June 27, 2019 11:00 am**

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The Rule 2016(b) statement conflicts with Statement of Financial Affairs question #16.
2. The set monthly payments to be made by the Trustee exceed the plan payment.
3. Per schedules I and J, monthly expenses exceed monthly income such that debtor is not able to make plan payments. 11 U.S.C. § 1325(a)(6). If debtor does make plan payments, schedules I and J must be significantly incorrect and should be amended.
4. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$3300.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: May 31, 2019

OBJCONF--KLW

/s/ Kathy Wright

Kathy Wright MO31047

Attorney for Trustee

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on May 31, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on May 31, 2019.

LAWANDA HILL
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SAINT LOUIS, MO 63121

/s/ Kathy Wright

Kathy Wright MO31047